

1 SONAL N. MEHTA (SBN 222086)

2 Sonal.Mehta@wilmerhale.com

3 WILMER CUTLER PICKERING

4 HALE AND DORR LLP

5 2600 El Camino Real, Suite 400

6 Palo Alto, California 94306

7 Telephone: (650) 858-6000

8 Facsimile: (650) 858-6100

9 DAVID Z. GRINGER (*pro hac vice*)

10 David.Gringer@wilmerhale.com

11 ARI HOLTZBLATT (*pro hac vice*)

12 Ari.Holtzblatt@wilmerhale.com

13 MOLLY M. JENNINGS (*pro hac vice*)

14 Molly.Jennings@wilmerhale.com

15 WILMER CUTLER PICKERING

16 HALE AND DORR LLP

17 1875 Pennsylvania Ave NW

18 Washington, DC 20006

19 Telephone: (202) 663-6000

20 Facsimile: (202) 663-6363

21 *Attorneys for Defendant*

22 FACEBOOK, INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

19 REVEAL CHAT HOLDCO, LLC, a Delaware
20 limited liability company, USA TECHNOLOGY
21 AND MANAGEMENT SERVICES, INC. (d/b/a
22 Lenddo USA), a Delaware corporation, CIR.CL,
23 INC., a dissolved Delaware corporation, and
24 BEEHIVE BIOMETRIC, INC., a dissolved
25 Delaware corporation,

26 Plaintiffs,

27 v.

28 FACEBOOK, INC., a Delaware corporation,

Defendant.

Case No. 5:20-CV-00363-BLF

**DECLARATION OF DAVID Z.
GRINGER IN SUPPORT OF
FACEBOOK'S MOTION FOR
ADMINISTRATIVE RELIEF TO
CONSIDER WHETHER CASES
SHOULD BE RELATED**

1 I, David Z. Gringer, declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent
3 Defendant Facebook, Inc. in the above-captioned action.

4 2. On December 8, 2020, I emailed counsel for plaintiffs in the above-captioned
5 action and asked whether Plaintiffs would stipulate to Defendant's motion for administrative
6 relief to consider whether the instant action and the recently filed *Klein* action, No. 5:20-cv-
7 08570-LHK, should be related. That same day, Plaintiffs' counsel responded that Plaintiffs
8 would agree to so stipulate.

9 3. On December 8, 2020, I also emailed counsel for Plaintiffs in the *Klein* action at
10 the Keller Lenkner firm and asked whether *Klein* Plaintiffs would stipulate to Defendant's
11 motion. The next day, December 9, 2020, counsel for the *Klein* Plaintiffs responded that *Klein*
12 Plaintiffs would not stipulate to Defendant's motion and that they would instead file a motion
13 opposing relation. No explanation was offered.

14 4. The Complaint in *Klein* is attached as Exhibit 1.

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed on this 10th day of December 2020 in Washington, District of Columbia.

17
18 By: /s/ David Z. Gringer

19 David Z. Gringer

20 **SIGNATURE ATTESTATION**

21 I am the ECF User whose identification and password are being used to file the
22 foregoing. Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatories have
23 concurred in this filing.

24 Dated: December 10, 2020

25 By: /s/ Sonal N. Mehta
26 Sonal N. Mehta
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